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# Open 21, Inc.

On-Line Public Educational Network for the 21<sup>st</sup> Century, Inc.

1701 K Street, N.W.  
Suite 800  
Washington, DC 20006  
202-835-8979

RECEIVED  
JUL 17 2000  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

July 17, 2000

Magalie Roman Salas, Secretary  
Federal Communications Commission  
The Portals  
445 Twelfth Street, S.W.  
TW-A325  
Washington, DC 20554

Dear Ms. Salas:

Enclosed please find an original and four copies of a Petition for Rule Making to amend the Television Table of Allotments to substitute channel 41 at St. Louis, Missouri for channel 40 at St. Louis, Missouri. Open 21, Inc. is an applicant for this facility (BPTTL-19960920WD) and this petition is filed in order to break mutual exclusivity between this application and a DTV television facility.


If you have any questions, please do not hesitate to contact me.

Sincerely,



Thomas Cohen  
President

Lr/tv/open21/st. louis 41 cover letter

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RM  
00-1671

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

**RECEIVED**  
JUL 17 2000  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In Re: )  
 )  
Amendment of Section 73.606(b) )  
of the Commission's Rules, the )  
Table of Allotments for Analog )  
Television Broadcast Stations )  
(St. Louis, Missouri) )

RM-\_\_\_\_\_

To: Chief, Allocations Branch  
Mass Media Bureau

**PETITION FOR RULE MAKING**

On-Line Public Educational Network for the 21<sup>st</sup> Century, Inc. ("Open21")  
applicant for a new non-commercial full power analog television station on Channel 40 at St. Louis,  
Missouri (the "Applicant"),<sup>1</sup> pursuant to Section 1.401 of the Commission's rules, 47 C.F.R. §  
1.401, and the Commission's Public Notices regarding a window for filing petitions for rule making  
to change analog television allotments that may conflict with digital television ("DTV") station  
allotments, authorizations, applications, or rule making proposals,<sup>2</sup> hereby petition the Commission  
to amend the Table of Allotments for analog television broadcast stations to substitute Channel 41  
for Channel 40 at St. Louis, Missouri, and to authorize the Applicant to amend its pending

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<sup>1</sup> The Applicant is On-Line Public Educational Network for the 21<sup>st</sup> Century, Inc. ("Open21") (File No. BPET-19960920WD).

<sup>2</sup> See Public Notice, Mass Media Bureau Announces Window Filing Opportunity for Certain Pending Applications and Allotment Petitions for New Analog TV Stations, DA 99-2605 (released November 22, 1999) (the "Amendment Public Notice"); see also, Public Notice, Window Filing Opportunity For Certain Pending Applications and Allotment Petitions for New Analog TV Stations Extended to July 15, 2000, DA 00-536 (released March 9, 2000).

application for Channel 40 to specify operation on Channel 41 without subjecting its application to competing applications. In support of this petition for rule making, the Applicant submits the following:

1. The Applicant has tendered for filing and has pending an application for a construction permit for a new non-commercial analog television station on Channel 40, St. Louis, Missouri. Since the reference coordinates for the proposed transmitter site are within the minimum co-channel separation distance for Zone II of 174.5 miles (or 280.8 kilometers) from St. Louis, Missouri, one of the 30 designated television markets subject to the Commission's freeze in the advanced television ("ATV") proceeding (i.e., an "ATV freeze zone"),<sup>3</sup> the Applicant specified a transmitter site outside of, and/or requested a waiver of, the ATV freeze in their respective applications.

2. In the DTV proceeding, the Commission stated that it would open a filing window, announced by Public Notice, during which pending analog full power television applications in an ATV freeze zone that would conflict with a DTV station allotment, authorization, application or rule making proposal could be amended to eliminate the DTV conflict, or could file a petition for rule making for an alternate channel below Channel 60 if necessary to avoid the DTV conflict.<sup>4</sup> The Amendment Public Notice implements this Commission decision, permitting ATV freeze area

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<sup>3</sup> See Advanced Television Systems, Mimeo No. 4074, 52 Fed. Reg. 28346 (1987).

<sup>4</sup> See Advanced Television Systems and Their Impact on the Existing Television Broadcast Service, MM Docket No. 87-268, Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders, FCC 98-315, 13 FCC Rcd 23992, 14 CR 674 at ¶¶ 40-42 (1998) (the "DTV Second MO&O").

applicants to file a petition for rule making to substitute a new channel below Channel 60.<sup>5</sup>

3. The Commission stated that it would require ATV freeze applicants to demonstrate that interference to a DTV station allotment, authorization, application or rule making proposal would be caused if the proposed channel substitution is not made.<sup>6</sup> As demonstrated by the attached Engineering Report,<sup>7</sup> the Applicant's analog Channel 41 application proposals would cause interference to the co-channel DTV Channel 40 allotment for WSIU-DT, at Carbondale, Illinois.<sup>8</sup>

4. The Commission also stated that applicants with pending full power analog applications subject to the ATV must propose a single alternate channel below Channel 60.<sup>9</sup>

5. As required by the Amendment Public Notice and Sections 73.610 and 73.623(c) of the Commission's rules, 47 C.F.R. §§ 73.610 and 73.623(c),<sup>10</sup> the Engineering Report demonstrates that the proposed allotment of Channel 41 to St. Louis, Missouri, meets all legal and technical requirements, including the minimum distance separation requirement to all other analog television stations,<sup>11</sup> and protects all DTV stations with allowances for *de minimis* interference.<sup>12</sup>

6. This proposal will cause short-spacing to WHSL, Channel 46, at East St. Louis,

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<sup>5</sup> See Amendment Public Notice at 4-6.

<sup>6</sup> See DTV Second MO&O at ¶ 42; see also, Amendment Public Notice at 4.

<sup>7</sup> See Engineering Report dated July 2000 and prepared by Venture Technologies Group, LLC, attached hereto as Exhibit A (the "Engineering Report").

<sup>8</sup> See Engineering Report.

<sup>9</sup> See DTV Second MO&O at ¶ 42; see also, Amendment Public Notice at 5.

<sup>10</sup> See Amendment Public Notice at 5.

<sup>11</sup> See Engineering Report.

<sup>12</sup> See Engineering Report.

Missouri, which is located 31.4 km (19.5 miles) from the Applicant's proposed transmitter site. Therefore, the Applicant requests a waiver of Section 73.610(d), Table 2 of Section 73.698, and other applicable Rules and Regulations of the Federal Communications Commission.

7. The Applicant hereby states its present intention to amend its pending application to specify operation on Channel 41, if analog Channel 41 is substituted for Channel 40, during the time period specified by the Commission in its allotment order, as required by the Commission.<sup>13</sup>

8. The Applicant submits that grant of this petition for rule making and the substitution of analog Channel 41 for Channel 40 at St. Louis, Missouri, would serve the public interest by permitting the initiation of a new noncommercial television service serving St. Louis, Missouri, and surrounding communities, without causing interference to any other existing station or any DTV station allotment, authorization, application or petition for rule making. Therefore, the public interest would be served by the grant of this petition.

9. Wherefore, the above premises being considered, the Applicant requests that the Commission grant this petition for rule making; amend Section 73.606(b), the Table of Allotments for analog television broadcast stations, to substitute Channel 41 for Channel 40 at St. Louis,

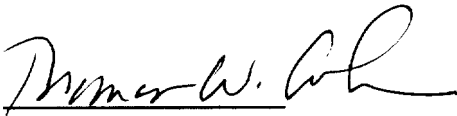
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<sup>13</sup> See DTV Second MO&O at ¶ 42; see also, Amendment Public Notice at 6.

Missouri and authorize the Applicant to amend its pending application for Channel 40 at St. Louis, Missouri to specify operation on Channel 40 without subjecting its application to competing applications.

Respectfully submitted,

Open21, Inc.

By:   
Thomas W. Cohen, Esq.  
President

1701 K Street N.W., Suite 800  
Washington, D.C. 20006  
(202) 835-8979 telephone  
(202) 833-9536 facsimile

July 17, 2000

**CERTIFICATE OF SERVICE**

I, Thomas Cohen, hereby certify that on this 17th day of July, 2000, an original and four copies of the foregoing "Petition for Rulemaking" have been served by hand upon the following

Magalie Roman Salas, Secretary  
Federal Communications Commission  
The Portals  
445 Twelfth Street, S.W.  
TW-A325  
Washington, DC 20554

And additional copies have been served by hand delivery or first class mail, postage prepaid, upon the following:

Clay Pendarvis, Chief  
Television Branch  
Federal Communications Commission  
445 12th Street, S.W., Room 2-A662  
Washington, D.C. 20554

John A. Karousos, Chief  
Allocations Branch  
Federal Communications Commission  
445 12th Street, S.W., Room 3-A320  
Washington, D.C. 20554

  
\_\_\_\_\_  
Thomas Cohen

**ENGINEERING REPORT  
PETITION FOR RULE MAKING  
TO AMEND SECTION 73.606(b)  
OF THE FCC RULES BY SUBSTITUTING  
UHF-TV NTSC CHANNEL 41 FOR CHANNEL 40  
AT ST. LOUIS, MISSOURI**

**JULY 2000**

This engineering report has been prepared on behalf of On-Line Public Educational Network for the 21<sup>st</sup> Century, Inc. ("Applicant"), an applicant for a new analog NTSC television station channel 40 at St. Louis, Missouri, in support of its petition for rule making to amend Section 73.606(b) of the FCC Rules and Regulations to substitute analog Channel 41 for the analog Channel 40 allotment for St. Louis, Missouri. The Applicant's Channel 40 application at St. Louis, Missouri (FCC File No. BPET-19960920WD) is mutually exclusive with the co-channel DTV station WSIU-DT at Carbondale, Illinois. Figure 1 illustrates the signal overlap of these facilities. Table 1 shows the allocation situation for the Applicant's proposed facility on channel 40.

Since widespread interference would otherwise occur, the Applicant proposes to amend the FCC Rule Section 73.606(b) as follows:

Section 73.606(b) Substitute NTSC Channel 41 for Channel 40.

The reference coordinate for the proposed new allotment at St. Louis, Missouri, remains the same that is in the Applicant's Channel 40 application:

38 degrees, 31', 47" N. Lat., 90 degrees, 17', 58" W. Long.

The directional transmitting antenna and antenna orientation for the proposed new allotment at St. Louis, Missouri remains the same that is in the Applicant's Channel 40 application. It is proposed to specify the Channel 41 allotment with a directional transmitting antenna. The proposed antenna would be:

Dielectric TLP16-B oriented toward 10 degrees true north.

The ERP for the proposed new allotment at St. Louis, Missouri remains the same that is in the Applicant's Channel 40 application. The proposed ERP for use with the allotment would be:

813 kW

with a radiation center of 280.2 meters AMSL for an antenna height above average terrain of :

130.8 meters.

Table 2 shows the allocation situation for the proposed NTSC Channel 41 allotment.

A study of predicted interference caused by the Applicant's proposed television service on channel 41 at St. Louis, Missouri, using a version of the Longley-Rice program as described in OET Bulletin No. 69 (July 2, 1997) and the Public Notice "Additional Application Processing Guidelines for Digital Television (DTV)" (August 1998). The FCC's Fortran-77 code was modified by RadioSoft for use its software program ComStudy 2.2 for operation on a Windows NT platform. Comparison of service/interference areas and populations indicates that this model closely matches the FCC's evaluation program. Best efforts have been made to use data and calculations identical to the FCC's program. Any slight differences are attributable to compiler, operating system and/or processor characteristics. The effect of any variance in calculated population values versus the FCC's program is minimized when analyzing a given model's results, e.g., new interference equals total interference less baseline interference. The effect is further reduced for ratios of calculated population values, e.g., incremental population affected as a percent

of total population served. The model employs the Longley-Rice propagation methodology and evaluates in grid cells of approximately 4 square kilometers using 3-second terrain data sampled approximately every 0.1 km at one degree azimuth intervals with 1990 census centroids.

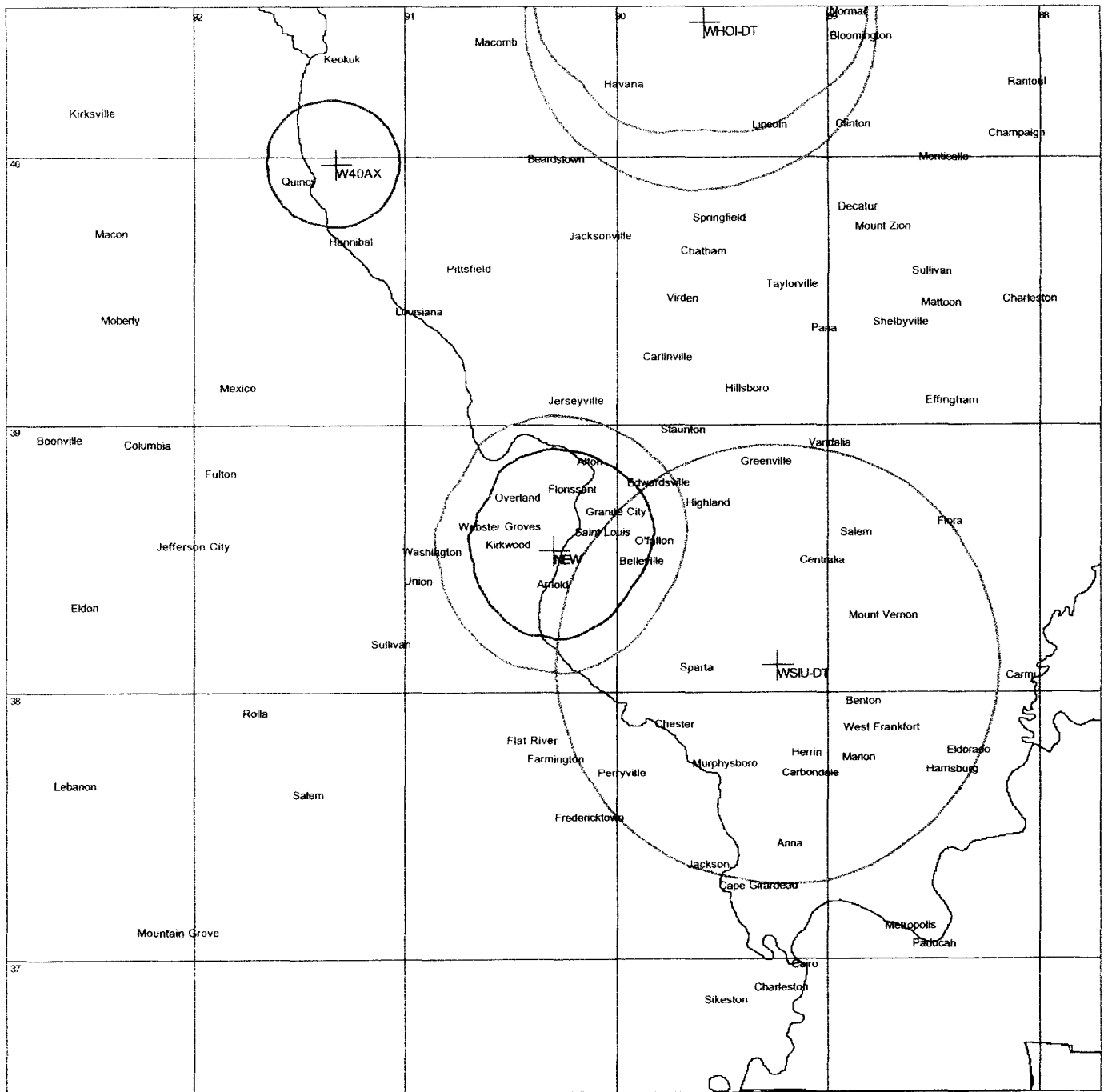
The baseline for the proposed new TV facility: No station on channel 40.

Proposed Change: Dielectric TLP16-B antenna oriented toward 10 degrees true north, Channel 41, 813 kW ERP, 130.8 meters HAAT, 38 degrees, 31', 47" N. Lat., 90 degrees, 17' 58" W. Long.

The results are depicted in Table 2 and comply with Commission policy and rules.

Based on the Commission's Public Notice, released June 2, 2000 (DA 00-1224) and the latest FCC CDBS data base, there are no Class A low power television status stations that conflict with the proposed Channel 41 allotment.

FIGURE 1 OPEN21 ST. LOUIS MO CH 40 CO CHANNEL STATIONS



Copyright (c) 1996 RadioSoft

Scale 1:2354000

— TV Grade 'A' — TV Grade 'B' — State Borders — Lat-Lon Grids

100 Km

TABLE 1: NTSC AND DTV UHF TV ALLOCATION STUDY FOR CHANNEL 40 AT ST. LOUIS, MISSOURI

ComStudy 2.2 RadioSoft

Call Sign	City	Class	ERP	Sig Type	Status	Dist	Prot	Clearance	D/U	Rx Gain	Rx F/B	Zone	Band	Ch#	A#	Matrix	Svc Contour	Svc Strength	Int Contour	Int Strength	Matrix Analy	Old Pop%	New Pop%	Total Pop	Old Pop	New Pop
KETC-DT	ST. LOUIS	DTV	985,000	D/M	Clean	10.1			-48	10.0	14.0	2	UHF	38	A-1	LR	F(50.90)	41	-	-		2.1%	2.1%	2704501	2704501	2704501
KETC-DT	ST. LOUIS	DTV	990,000	D/M	Clean	10.1			-48	10.0	14.0	2	UHF	39	A-1	LR	F(50.90)	41	-	-		2.1%	2.1%	2721706	2721706	2721706
KETC-DT	ST. LOUIS	DTV	990,000	D/M	Clean	10.1			-48	10.0	14.0	2	UHF	39	A-1	LR	F(50.90)	41	-	-		2.1%	2.1%	2721706	2721706	2721706
KKFT-DT	FORT SCOT	DTV	327,000	D/M	Clean	401.5	148	148.0	2	10.0	14.0	2	UHF	40	Co	LR	F(50.90)	41	-	-		3.4%	3.4%	328923	328923	328923
KKFT-DT	FORT SCOT	DTV	327,000	D/M	Clean	401.5	148	148.0	2	10.0	14.0	2	UHF	40	Co	LR	F(50.90)	41	-	-		3.4%	3.4%	329485	329485	329485
KNLJ	JEFFERSON	Analog	2040,000	D/M	Clean	157.1	120	121.1	-9	0.0	0.0	2	UHF	25.2	T-15	LR	F(50.50)	64	-	-		1.4%	1.4%	316548	316548	316548
NEW	JEFFERSON	Analog	5000,000	D/M	Clean	175.4	32	33.0	-23	0.0	0.0	2	UHF	36-	T-4	LR	F(50.50)	64	-	-		0.1%	0.1%	342017	342017	342017
NEW	ST. LOUIS	Analog	613,000	D/M		0.0	121	121.0	46	0.0	6.0	2	UHF	40-	Co	LR	F(50.50)	64	-	-				2281401	2281401	68145
WBUY	HOLLY SPR	Analog	4660,000	D/M	Clean	395.7	155	157.7	26	0.0	6.0	2	UHF	40.2	Co	LR	F(50.50)	64	-	-		0.1%	0.1%	1027200	1027200	1027200
WHMBTV	INDIANAPOL	Analog	2090,000	D/M	Clean	364.7	109	110.7	28	0.0	6.0	1	UHF	40.2	Co	LR	F(50.50)	64	-	-		0.1%	0.1%	1719678	1719678	1719678
WHMBTV	INDIANAPOL	Analog	2090,000	D/M	Clean	364.7	109	110.7	28	0.0	6.0	1	UHF	40.2	Co	LR	F(50.50)	64	-	-		0.1%	0.1%	1718722	1718722	1718722
WHOI-DT	CREVE COEUR	DTV	80,300	D/M	Clean	227.5			2	10.0	14.0	1	UHF	40	Co	LR	F(50.90)	41	-	-		0.1%	0.1%	564534	564534	564452
WHOI-DT	PEORIA	DTV	90,000	D/M	Clean	243.6			2	10.0	14.0	1	UHF	40	Co	LR	F(50.80)	41	-	-		0.1%	0.1%	568504	568504	568469
WHOI-DT	PEORIA	DTV	90,000	D/M	Clean	243.6			2	10.0	14.0	1	UHF	40	Co	LR	F(50.90)	41	-	-		0.1%	0.1%	568504	568504	568469
WKNT	BOWLING GREEN	Analog	776,000	D/M	Clean	399.6	134	135.6	26	0.0	6.0	2	UHF	40+	Co	LR	F(50.50)	64	-	-		0.1%	0.1%	242282	242282	242282
WKPD-DT	PADUCAH	DTV	50,000	D/M	Clean	214.3	100	100.3	-49	10.0	14.0	2	UHF	41	A+1	LR	F(50.90)	41	-	-		0.1%	0.1%	253494	253494	253494
WKPD-DT	PADUCAH	DTV	50,000	D/M	Clean	214.3	100	100.3	-49	10.0	14.0	2	UHF	41	A+1	LR	F(50.90)	41	-	-		0.1%	0.1%	251486	251486	251486
WRSPTV	SPRINGFIELD	Analog	2000,000	D	Clean	159.0	120	120.0	-	-	-	1	UHF	55+	T+15	LR	-	-	-	-		N/C	N/C	N/C	N/C	N/C
WSIU-DT	CARBONDALE	DTV	1000,000	D/M		103.7			2	10.0	14.0	1	UHF	40	Co	LR	F(50.90)	41	-	-				604920	604920	536034
WSIU-DT	CARBONDALE	DTV	1000,000	D/M		103.7			2	10.0	14.0	1	UHF	40	Co	LR	F(50.90)	41	-	-				738517	738517	562157

TABLE 2: NTSC AND DTV UHF TV ALLOCATION STUDY FOR CHANNEL 41 AT ST. LOUIS, MISSOURI

ComStudy 2.2 RadioSoft

Callsign	City	Class	ERP	SubType	Status	Dist	Prot	Clearance	D/U	Rx Gain	Rx F/B	Zone	Band	Ch#	Adj	Matrix	Svc Contour	Svc Strength	Int Contour	Int Strength	Matrix Analy	Old Pop%	New Pop%	Total Pop	Old Pop	New Pop
KJMH-DT	BURLINGT	DTV	50,000	D/M	Clear	264.7	240	19.7	2	10.0	14.0	2	UHF	41	Co	LR	F(50.90)	41	-	-	-	3.4%	3.4%	149291	146836	146831
KJMH-DT	BURLINGT	DTV	50,000	D/M	Clear	264.7	240	19.7	2	10.0	14.0	2	UHF	41	Co	LR	F(50.90)	41	-	-	-	3.4%	3.4%	149291	146836	146831
KJMH-DT	BURLINGT	DTV	500,000	D/M	Clear	282.6	240	19.7	2	10.0	14.0	2	UHF	41	Co	LR	F(50.90)	41	-	-	-	3.4%	3.4%	840719	840719	840087
KSHB-TV	KANSAS CT	Analog	1320,000	D/M	Clear	378.1	340	48.1	28	0.0	6.0	2	UHF	41	Co	LR	F(50.50)	64	-	-	-	3.4%	3.4%	1692163	1692163	1692163
KSHB-TV	KANSAS CT	Analog	3680,000	D/M	Clear	378.1	340	48.1	28	0.0	6.0	2	UHF	41	Co	LR	F(50.50)	64	-	-	-	3.4%	3.4%	1819130	1819130	1819130
NEW	SIKESTON	Analog	5000,000	D	Outband	140.5	30	10.0	-	-	-	2	UHF	45	T+4	LR	-	-	-	-	N/C	N/C	N/C	N/C	N/C	
NEW	ST. LOUIS	Analog	813,000	D/M	Clear	0.0	90	0.0	-15	0.0	6.0	2	UHF	40	A-1	LR	F(50.50)	64	-	-	-	3.4%	3.4%	2281401	2281401	2281401
WBUY-DT	HOLLY SPR	DTV	129,000	D/M	Clear	396.7	340	19.7	2	10.0	14.0	2	UHF	41	Co	LR	F(50.90)	41	-	-	-	3.4%	3.4%	1065680	1065680	1065680
WBUY-DT	HOLLY SPR	DTV	129,000	D/M	Clear	396.7	340	19.7	2	10.0	14.0	2	UHF	41	Co	LR	F(50.90)	41	-	-	-	3.4%	3.4%	1027237	1027237	1027237
WBUY-DT	HOLLY SPR	DTV	500,000	D/M	Clear	396.7	340	19.7	2	10.0	14.0	2	UHF	41	Co	LR	F(50.90)	41	-	-	-	3.4%	3.4%	1134242	1134242	1134242
WCFN	SPRINGFIE	Analog	200,000	D/M	Clear	155.6	140	12.6	-41	0.0	6.0	1	UHF	48	T+8	LR	F(50.50)	64	-	-	-	3.4%	3.4%	230186	230186	230186
WOKA	PADUCAH	Analog	2450,000	D/M	Clear	173.6	30	141.0	-41	0.0	6.0	2	UHF	49 Z	T+8	LR	F(50.50)	64	-	-	-	3.4%	3.4%	445000	445000	445000
WDRB	LOUISVILLE	Analog	5000,000	D/M	Clear	380.1	340	19.7	28	0.0	6.0	2	UHF	41	Co	LR	F(50.50)	64	-	-	-	3.4%	3.4%	1465594	1465594	1465594
WHOI-DT	CREVE COE	DTV	80,300	D/M	Clear	277.5	140	12.6	-48	10.0	14.0	1	UHF	40	A-1	LR	F(50.90)	41	-	-	-	3.4%	3.4%	584534	584534	584534
WICD-DT	CHAMPAIGN	DTV	50,000	D/M	Clear	267.6	340	22.6	2	10.0	14.0	1	UHF	41	Co	LR	F(50.90)	41	-	-	-	3.4%	3.4%	578227	578227	578227
WICD-DT	CHAMPAIGN	DTV	50,000	D/M	Clear	267.6	340	22.6	2	10.0	14.0	1	UHF	41	Co	LR	F(50.90)	41	-	-	-	3.4%	3.4%	577851	577851	577851
WICS-DT	SPRINGFIELD	DTV	75,000	D/M	Clear	158.0	140	13.0	-49	10.0	14.0	1	UHF	42	A+1	LR	F(50.90)	41	-	-	-	3.4%	3.4%	687458	687458	687458
WICS-DT	SPRINGFIELD	DTV	75,000	D/M	Clear	158.0	140	13.0	-49	10.0	14.0	1	UHF	42	A+1	LR	F(50.90)	41	-	-	-	3.4%	3.4%	687458	687458	687458
WICS-DT	SPRINGFIELD	DTV	725,000	D/M	Clear	158.0	140	13.0	-49	10.0	14.0	1	UHF	42	A+1	LR	F(50.90)	41	-	-	-	3.4%	3.4%	1124204	1124204	1124204
WKPD-DT	PADUCAH	DTV	50,000	D/M	Clear	214.3	-	-	2	10.0	14.0	2	UHF	41	Co	LR	F(50.90)	41	-	-	-	3.4%	3.4%	251496	251496	250775
WKPD-DT	PADUCAH	DTV	50,000	D/M	Clear	214.3	-	-	2	10.0	14.0	2	UHF	41	Co	LR	F(50.90)	41	-	-	-	3.4%	3.4%	253494	253494	252796
WQEC	QUINCY	Analog	34,800	D/M	Clear	183.0	40	37.0	-25	0.0	0.0	1	UHF	27 +	T-14	LR	F(50.50)	64	-	-	-	3.4%	3.4%	101127	101127	101127
WQEC	QUINCY	Analog	2000,000	D/M	Clear	183.0	40	37.0	-25	0.0	0.0	1	UHF	27 +	T-14	LR	F(50.50)	64	-	-	-	3.4%	3.4%	269792	269792	269792
WRSPTV	SPRINGFIE	Analog	2000,000	D	Clear	159.0	90	59.0	-	-	-	1	UHF	56 +	T+14	LR	-	-	-	-	N/C	N/C	N/C	N/C	N/C	
WSIU-DT	CARBONDA	DTV	1000,000	D/M	Clear	103.7	-	-	-48	10.0	14.0	1	UHF	40	A-1	LR	F(50.90)	41	-	-	-	3.4%	3.4%	738517	708845	708845
WSIU-DT	CARBONDA	DTV	1000,000	D/M	Clear	103.7	-	-	-48	10.0	14.0	1	UHF	40	A-1	LR	F(50.90)	41	-	-	-	3.4%	3.4%	694920	694920	692607
WTCT	MARION	Analog	2880,000	D/M	Clear	156.6	30	99.0	-25	0.0	0.0	1	UHF	27 Z	T-14	LR	F(50.50)	64	-	-	-	3.4%	3.4%	357625	357625	357625